

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LOURENCO GONCALVES and
CLEVELAND-CLIFFS INC.,

Plaintiffs,

v.

GORDON JOHNSON,

Defendant.

Case No. 1:24-cv-00673-JEG

MAGISTRATE JUDGE
JAMES E. GRIMES JR.

PLAINTIFFS' PRELIMINARY ESTIMATE OF FEES AND EXPENSES

The following is a preliminary estimate and itemization of the expected attorney fees and costs of Plaintiffs Cleveland-Cliffs Inc. and Lourenco Goncalves anticipated to be the subject of a claim in this case.

<u>Attorney's Fees</u>		<u>Costs</u>	
Preliminary Investigation & Filing Complaint	<u>\$55,000</u>	Depositions	<u>\$20,000</u>
Procedural Motions Practice	<u>\$15,000 to \$30,000</u>	Experts	<u>\$40,000</u>
Discovery	<u>\$75,000 to \$400,000</u>	Witness Fees	<u>\$5,000</u>
Dispositive Motions Practice	<u>\$50,000 to \$100,000</u>	Other	<u>\$10,000</u>
Settlement Negotiations	<u>\$10,000 to \$40,000</u>		
TOTAL FEES	<u>\$205,000 – 625,000</u>	TOTAL COSTS	<u>\$75,000</u>

Plaintiffs will provide a revised estimate in the event that a trial is required after dispositive motions, though Plaintiffs preliminarily estimate that they could incur additional fees and costs of \$300,000 – \$600,000 in that event.

Dated: May 20, 2024

Respectfully submitted,

/s/ Kristin S.M. Morrison

Robert S. Faxon

Ohio State Bar No. 0059678

Kristin S.M. Morrison

Ohio State Bar No. 0085004

Caitlin M. Dunnett

Ohio State Bar No. 0102616

JONES DAY

North Point

901 Lakeside Ave.

Cleveland, Ohio 44114

Telephone: 216-586-3939

Facsimile: 216-579-0212

Email: rfaxon@jonesday.com

kmorrison@jonesday.com

cdunnett@jonesday.com

*Attorneys for Plaintiffs Lourenco Goncalves
and Cleveland-Cliffs Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Caitlin M. Dunnett

Attorney for Plaintiffs